

UNITED STATES DISTRICT COURT

Northern District of New York

6th Judicial Division

_____	)	
JANE DOE, JOHN DOE	)	
	)	Case No.3:24-cv-274 (MAD/ML)
	)	
Plaintiffs	)	
	)	
-against-	)	
	)	<b>DECLARATION OF</b>
	)	<b>JANE DOE</b>
	)	
JONATHAN REES aka GREG ELLIS	)	
aka JOHNATHAN REES aka JONNY REES	)	
aka JACOB LORENZO	)	
	)	
Defendant	)	
_____	)	

**DECLARATION OF JANE DOE IN SUPPORT OF ENTRY FOR DEFAULT**

I, JANE DOE, declare under penalty of perjury that the foregoing is true and correct:

1. I am the Plaintiff in the above-captioned action and submit this Declaration in support of my motion for Entry of Default against Defendant Jonathan Rees aka Greg Ellis aka Johnathan Rees aka Jonny Rees aka Jacob Lorenzo.
2. At this time, Defendant has been served via alternative service with the Summons, Second Amended Complaint, Judicial Case Initial Pretrial Conference, Notice and Consent Form to Proceed Before a U.S. Magistrate Judge, and the Civil Cover Sheet.
3. On belief, Defendant wrote a book called "The Respondent", about the Family Court

System and by his own admission, has an advanced in-depth knowledge of the court system, including Summons, Service, and Responding to a Lawsuit action. Defendant has used this knowledge to garner sympathy and leeway in previous Court actions offering his second book “The Silver Bullet”, a guide to assist Respondents/Defendants to beat the Court system, which ultimately drags out proceedings deliberately to increase Attorney fees for Plaintiff’s, destroying their health and financial stability in the process, and why in part I filed as Pro Se in my Federal Action against Defendant.

4. Defendant shares openly in his books that the rule of Law doesn’t apply to him and therefore doesn’t abide by set dates ordered by the Court. I have no doubt in a few months after the default judgment has been ordered and I’ve spent a substantial amount of money and time on this case, Defendant will attempt to get the Default Judgment overturned citing he didn’t know about the case and a myriad of other excuses he can muster to play victim with the Court and to drag this case out longer at the detriment to myself, my children, and the Court, when he knows exactly what he’s doing. Defendant enjoys playing games in order to abuse further —as entertainment—and generates him additional revenue with Defendant spewing his misogynistic rhetoric online as part of his victimhood campaign.

#### **Service of Process Rules**

5. Pursuant to the Federal Rules of Civil Procedure, a party may serve an individual within a judicial district of the U.S. by “following state law for serving a summons in an action brought in courts of general jurisdiction in the state where the district court is located or where service is made . . . .” Fed. R. Civ. Pro. 4(e).

6. Further, pursuant to the New York Civil Practice Law and Rules:  
Personal service upon a person shall be made by any of the following methods:

1. by delivering the summons within the state to the person to be served; or
2. by delivering the summons within the state to a person of suitable age and discretion at the actual place of business, dwelling place or usual place of abode of the person to be served

and either by mailing the summons to the person to be served . . . ;

3. where service under paragraphs 1 and 2 cannot be made with due diligence, by affixing the summons to the door of either the actual place of business, dwelling or usual place of abode within the state of the person to be served and by either mailing the summons to such person at his or her last known residence . . . , such affixing and mailing to be effected within 20 days of each other; proof of such service shall be filed with the clerk of the court designated in the summons within twenty days of either such affixing or mailing, whichever is effected later; service shall be complete ten days after such filing . . . . N.Y. C.P.L.R. § 308.

**Plaintiff's Personal Service Attempts and Service**

**via "Nail and Mail"**

7. Plaintiffs filed their Complaint on February 24, 2024. *See* Pl. Compl. (Entered February 26, 2024), ECF No. 1, with Amended Complaint filed and entered on March 20, 2024, ECF No. 14 and Second Amended Complaint entered on March 24, 2025, ECF No. 56.

8. Plaintiffs were required to serve Defendant within 60 days of the filing of their Complaint. *See* Gen. Order No. 25 (March 8, 2024), ECF No. 9. New Summons issued March 26, 2025, ECF No. 59.

9. Defendant Jonathan Rees' primary residential property, is located at 2251 W. ROSCOE ST. CHICAGO, IL 60618 and is his registered address with the DMV for his Illinois Driving License since November 30th, 2023, **EXHIBIT 1**.

10. Defendant asserted his mailing address as PMB 101, 1770, S. Randall Road, Suite A, Geneva IL. 60134-4646 to Broome Family Court in his response to my Petition, **EXHIBIT 2**.

11. Plaintiffs via Process Server mailed Summons, Second Amended Complaint, Judicial Case Initial Pretrial Conference, Notice and Consent Form to Proceed Before a U.S. Magistrate Judge, and the Civil Cover Sheet, *See* ECF No. 60, Affidavit of Service, Certificate of Mailing.

12. Plaintiffs via Process Server emailed Defendant Summons, Second Amended Complaint, Judicial Case Initial Pretrial Conference, Notice and Consent Form to Proceed Before a U.S. Magistrate Judge, and the Civil Cover Sheet. Under Section 2-203.1 of the Illinois Code of Civil Procedure (735 ILCS 5/2-203.1) service by e-mail shall be made by (i) sending an e-mail to the defendant/respondent at his or her current e-mail address; (ii) attaching a copy of the summons, complaint/petition, and any other required documents to the e-mail. Defendant can therefore be served via email. Service sent to email addresses: greg@therespondent.com; greg@monkeytoes.me; reesispositive@gmail.com; jonny@reesispositive.com; thepetitioner@proton.me; reesjonny@icloud.com; gregellistv@mac.com; hello@aliveinstitute.com; alivecoaching@icloud.com; entertwine@proton.me; casatq@icloud.com; casatq@me.com; confidentialjohndoe1@proton.me, ECF No. 60, Affidavit of Service, Certificate of e-mailing.

13. Plaintiffs via Process Server emailed and mailed Defendant's Attorney's on record who represented Defendant in Plaintiff's Family Court Petition with his Attorney's attending the trial on April 17th, 2024 to: Chris Brown, Esq. [chris@chrisbrownlaw.com](mailto:chris@chrisbrownlaw.com) and Richard Miller II, Esq. [rhm2law@gmail.com](mailto:rhm2law@gmail.com) and to Chris Brown, Esq. Chris Brown Law, 105 Rano Blvd. Vestal, New York, 13850 and Richard Miller II, Esq. Attorney and Counselor at Law, 2304 North Street, Endwell, New York, 13760 and Ricky Andreorio, Esq., who represented Defendant in the Violation of the Order of Protection petition in attendance at Broome Family Court with Defendant on April 16th, 2025 [ricky@andreoriolaw.com](mailto:ricky@andreoriolaw.com) 3439 Vestal Pkwy E. PMB 383, Vestal, NY 13850, ECF No. 60, Affidavit of Service.

14. On April 1st, 2025 at 5.30 p.m., April 6<sup>th</sup> 2025 at 12:24 p.m., April 8th 2025 at 12:50 p.m., and April 9th 2025 6.40 p.m., a process server, who was over the age of 18 and not a party to the action, attempted to serve Defendant with the Summons, Second Amended Complaint, Judicial Case Assignment Form, Joint Civil Case Management Plan Containing Notice of Initial Pretrial Conference, Notice and Consent Form to Proceed Before a U.S. Magistrate Judge, and the Civil Cover Sheet at 2251 W. ROSCOE ST. CHICAGO, IL 60618. The process server was

unable to personally serve the Defendant, or a person of suitable age and discretion during these service attempts. *See* Aff. of Service (entered April 21st, 2025), ECF No. 60.

1. Three attempts at personal service on different dates and at different times constituted diligent efforts to effectuate personal service. *See Gardner v. Lefkowitz*, 737. Fed. Appx. 597, 597 (N.D.N.Y. 2018) (finding plaintiff was permitted to use “nail and mail” service after making three personal service attempts on different dates and times).
2. Because personal service could not be made with due diligence, on April 10th, 2025 at 10.15 a.m., a process server, who was over the age of 18 and not a party to the action, affixed the foregoing documents Summons, Second Amended Complaint, Judicial Case Assignment Form, Joint Civil Case Management Plan Containing Notice of Initial Pretrial Conference, Notice and Consent Form to Proceed Before a U.S. Magistrate Judge, and the Civil Cover Sheet, to the Defendant’s door at the entrance of the property: 2251 W. ROSCOE ST. CHICAGO, IL 60618. Plaintiff filed this Affidavit of Service on April 21st 2025, ECF No. 60.
15. On April 17th, 2025, a process server, who was over the age of 18 and not a party to the action, mailed the aforementioned documents to Defendant at 2251 W. ROSCOE ST. CHICAGO, IL 60618 via First Class mail. *See* Aff. of Mailing (April 21st, 2025), ECF No. 60.
16. As an additional layer of due diligence and precaution given the Defendant wrote the book *The Respondent on how to avoid service and beat the court system for Respondents/ Defendants*, on April 18th, 2025 Plaintiff’s mailed the aforementioned documents to Defendant to all known addresses via First Class mail, **EXHIBIT 3**, to:
  - 1) 2251 W. ROSCOE ST. CHICAGO, IL 60618;
  - 2) 1552 COUNTRY SQUIRE DRIVE, GENEVA, IL 60134;
  - 3) 101, 1770 S. RANDALL ROAD, SUITE A, GENEVA IL 60134-4646;

4) 2309 FLORIMOND AVENUE, LONG BEACH, IN 46360;

5) 522 N CENTRAL AVENUE, #831 SMB#77452, PHOENIX, AZ 85004.

17. Plaintiffs filed Affidavit of Service on April 21st, 2025. *See* ECF No. 60, Summons Returned Executed.

18. Therefore, because Plaintiffs were unable to personally serve Defendant, despite diligent efforts to do so, she was permitted to use “nail and mail” service.

19. Plaintiffs satisfied New York’s “nail and mail” requirements under N.Y. C.P.L.R. § 308.

20. As such, within ten days of nailing, documents were mailed on April 17th, 2025 with a backup mailing on April 18th, 2025, filings of the process servers’ affidavit of mailing of the documents and affidavit of service by affixing them to the door of Defendant’s residence—on April 10th, 2025—service was complete.

21. Defendant never returned the acknowledgement form to Plaintiffs or otherwise acknowledged service of the documents.

### **Conclusion**

22. I have demonstrated diligent efforts with Defendant knowledgeable of these Court proceedings, with Defendant making a conscious decision not to plead, answer or otherwise defend Plaintiffs action against him. The party against whom it seeks a judgment of affirmative relief is not an infant, in the military, or an incompetent person. I support the request for Entry of Default on Defendant.

Executed on May 9th, 2025.



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Jane Doe

Plaintiff

**EXHIBIT 1****DMV Abstract Jonathan Rees Driving License, Illinois**

SUPERVISION

R200-4206-8083-0 AB314

02 27 25

DDL: Y

PURSUANT TO THE PROVISIONS OF THE ILLINOIS VEHICLE CODE THE FOLLOWING INFORMATION IS FURNISHED FROM THE DRIVERS LICENSE FILE OF THE PERSON IDENTIFIED ABOVE

R200-4206-8083-0

JONATHAN REES  
2251 W ROSCOE ST  
CHICAGO 60618

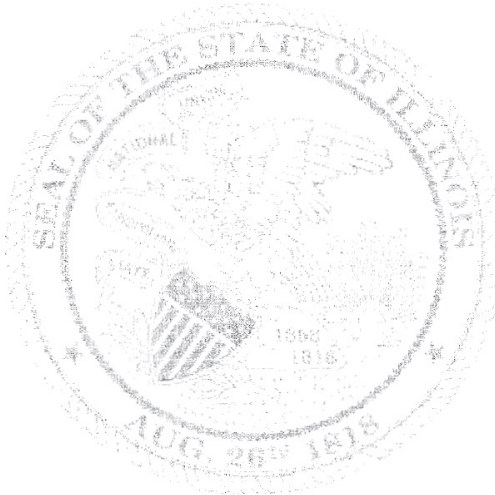
CONT LIC DATE	ISSUE DATE	BIRTH DATE
11' 30' 23	11' 30' 23	03' 21' 68

GENDER	HEIGHT	WEIGHT	HAIR	EYES	D.E.	CDL	TL	CLASS	ENDORS	MC	RESTRICTION	EXPIRATION DATE
M	5' 11	170	BRN	HZL		N	1	D		X	NONE	03' 21' 28

TYPE  
ACTIONSTOP IN  
EFFECT

THIS ADDITIONAL SUPERVISION INFORMATION IS BEING  
PROVIDED IN ACCORDANCE WITH SECTION 6-204 OF THE  
ILLINOIS VEHICLE CODE AND IS SUBJECT TO THE  
LIMITATIONS CONTAINED THEREIN.

NO SUPERVISIONS ON RECORD  
\* END OF RECORD \*



\* This is to certify, to the best of my knowledge and belief, after a careful search of my records, that the information set out herein is a true and accurate copy of the captioned individual's driving record; identified by driver's license number, and I certify that all statutory notices required as a result of any driver control actions taken have been properly given.

*Allyson H. ...*  
SECRETARY OF STATE

(Form DSDASQ - Rev. 8/24/2011)



**EXHIBIT 2**

**1. Mailing Address Submitted to Broome Family Court by Jonathan Rees aka Greg Ellis**

**2. Confirmation of Attorney's and their Addresses**

File #: 47031 (O-03679-23, O-00379-24) FC-100 (09/2020) Page 1 of 1

**FAMILY COURT OF THE STATE OF NEW YORK**  
**COUNTY OF BROOME**  
In the Matter of an Article 8 Family Offense Proceeding

File #: 47031  
Docket #: O-03679-23  
O-00379-24

(Petitioner)  
Jonathan Rees (Respondent)

**NOTICE TO APPEAR  
(IN PERSON)**

To: **\*\* Confidential \*\***

Christopher T. Brown Esq. – email  
105 Rano Blvd.  
Vestal, NY 13850

Jonathan Rees – mail  
PMB 101  
1770 S. Randall Rd., Ste. A  
Geneva, IL 60134-4646

Richard H. Miller II Esq. – email  
2304 NORTH ST  
ENDWELL, NY 13760-6125

Robert C. Kilmer Esq. – email  
PO Box 37  
Owego, NY 13827-0037

You are hereby notified to appear **IN PERSON** on:

Date/Time/Part: **March 18, 2024 at 09:45 AM in Part A – Bal of AM**  
Purpose: **Trial and In-Person Appearance**  
Presiding: **Hon. Mark H. Young**  
Location: **Courthouse, 65 Hawley Street, Binghamton, NY 13902**  
Floor: **2**  
Room: **A Court**

**AND**

Date/Time/Part: **April 17, 2024 at 01:15 PM in Part A**  
Purpose: **Trial and In-Person Appearance**  
Presiding: **Hon. Mark H. Young**  
Location: **Courthouse, 65 Hawley Street, Binghamton, NY 13902**  
Floor: **2**  
Room: **A Court**

Please bring this notice with you and check in with the Court Officer in the Part.

ated: February 13, 2024 Anne M. Simms, Chief Clerk

Broome County Department of Social Services – email



Law Office of Ricky Andreorio

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April 11, 2025

Broome County Family Court  
65 Hawley Street  
Binghamton, NY 13902-1766

Re: [REDACTED] v. Rees  
File No.: 47031  
Docket#: O-03679-23/24A

Witness Information: Jordon Lilley  
428 Collyer Rd.  
Town of Smithville  
New York, 13778

Dear Judge Gorman,

I am writing to request permission for the above witness to be appear virtually for the Trial proceedings scheduled on April 16, 2025..

Thank you for your time and consideration in this matter. If any additional information is required please let me know.

Respectfully yours,



Ricky D. Andreorio, Esq.  
3439 Vestal Pkwy E.  
PMB 383  
Vestal, NY 13850  
(917) 399-1704  
[Ricky@Andreoriolaw.com](mailto:Ricky@Andreoriolaw.com)

**EXHIBIT 3****Certified Mail Receipts**

**U.S. Postal Service™  
CERTIFIED MAIL® RECEIPT**  
Domestic Mail Only

For delivery information, visit our website at [www.usps.com](http://www.usps.com)®.

Michigan City, IN 46360

Certified Mail Fee \$4.85 0770 06

Extra Services & Fees (check box, add fee as appropriate)

<input type="checkbox"/> Return Receipt (hardcopy)	\$0.00
<input type="checkbox"/> Return Receipt (electronic)	\$0.00
<input type="checkbox"/> Certified Mail Restricted Delivery	\$0.00
<input type="checkbox"/> Adult Signature Required	\$0.00
<input type="checkbox"/> Adult Signature Restricted Delivery	\$0.00

Postage \$2.59

Total Postage and Fees \$7.44

Sent To  
Greg Ellis AKA Jonathan Rees  
2309 Florimond Ave  
Long Beach, IN 46360

PS Form 3800, January 2023 PSN 7530-02-000-9047 See Reverse for Instructions

**U.S. Postal Service™  
CERTIFIED MAIL® RECEIPT**  
Domestic Mail Only

For delivery information, visit our website at [www.usps.com](http://www.usps.com)®.

Phoenix, AZ 85004

Certified Mail Fee \$4.85 0770 06

Extra Services & Fees (check box, add fee as appropriate)

<input type="checkbox"/> Return Receipt (hardcopy)	\$0.00
<input type="checkbox"/> Return Receipt (electronic)	\$0.00
<input type="checkbox"/> Certified Mail Restricted Delivery	\$0.00
<input type="checkbox"/> Adult Signature Required	\$0.00
<input type="checkbox"/> Adult Signature Restricted Delivery	\$0.00

Postage \$2.59

Total Postage and Fees \$7.44

Sent To  
Greg Ellis AKA Jonathan Rees  
322 N Central Ave #831 SMB  
Phoenix, AZ 85004

PS Form 3800, January 2023 PSN 7530-02-000-9047 See Reverse for Instructions

**U.S. Postal Service™  
CERTIFIED MAIL® RECEIPT**  
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For delivery information, visit our website at [www.usps.com](http://www.usps.com)®.

Geneva, IL 60134

Certified Mail Fee \$4.85 0770 06

Extra Services & Fees (check box, add fee as appropriate)

<input type="checkbox"/> Return Receipt (hardcopy)	\$0.00
<input type="checkbox"/> Return Receipt (electronic)	\$0.00
<input type="checkbox"/> Certified Mail Restricted Delivery	\$0.00
<input type="checkbox"/> Adult Signature Required	\$0.00
<input type="checkbox"/> Adult Signature Restricted Delivery	\$0.00

Postage \$2.59

Total Postage and Fees \$7.44

Sent To  
Greg Ellis AKA Jonathan Rees  
101 1716 South Randall Road Suite A  
Geneva, IL 60134-4646

PS Form 3800, January 2023 PSN 7530-02-000-9047 See Reverse for Instructions

**U.S. Postal Service™  
CERTIFIED MAIL® RECEIPT**  
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Geneva, IL 60134

Certified Mail Fee \$4.85 0770 06

Extra Services & Fees (check box, add fee as appropriate)

<input type="checkbox"/> Return Receipt (hardcopy)	\$0.00
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<input type="checkbox"/> Adult Signature Required	\$0.00
<input type="checkbox"/> Adult Signature Restricted Delivery	\$0.00

Postage \$2.59

Total Postage and Fees \$7.44

Sent To  
Greg Ellis AKA Jonathan Rees  
1552 Country Squire Drive  
Geneva, IL 60134

PS Form 3800, January 2023 PSN 7530-02-000-9047 See Reverse for Instructions

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For delivery information, visit our website at [www.usps.com](http://www.usps.com)®.

Chicago, IL 60618

Certified Mail Fee \$4.85 0770 06

Extra Services & Fees (check box, add fee as appropriate)

<input type="checkbox"/> Return Receipt (hardcopy)	\$0.00
<input type="checkbox"/> Return Receipt (electronic)	\$0.00
<input type="checkbox"/> Certified Mail Restricted Delivery	\$0.00
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<input type="checkbox"/> Adult Signature Restricted Delivery	\$0.00

Postage \$2.59

Total Postage and Fees \$7.44

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Greg Ellis AKA Jonathan Rees  
2251 West Roscoe Street  
Chicago, IL 60618

PS Form 3800, January 2023 PSN 7530-02-000-9047 See Reverse for Instructions